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Attorneys for Defendant CoreCivic

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ATLP, a minor, by and through his Guardian Ad Litem Tayloria Taylor; and AJB, a minor, by and through his Guardian Ad Litem Tayloria Taylor, and Tayloria Taylor as Co-Special Administrator of the Estate of Brandon Lavon Patton, Deceased.

Plaintiffs,

V.

CoreCivic, Inc., formerly Corrections Corporation of America, a foreign corporation d/b/a Nevada Southern Detention Center; Doe CoreCivic Employees I through XX; Does I through X; and Roe Entities I through X, inclusive.

Defendants.

Case No. 2:21-cv-02072-JCM-EJY

**STIPULATION AND
ORDER TO EXTEND THE
DEADLINES TO FILE REPLIES
IN SUPPORT OF MOTION FOR
SUMMARY JUDGMENT AND
DAUBERT MOTION**

Plaintiffs, Tayloria Taylor, as Co-Special Administrator of the Estate of Brandon Patton, ATLP, and AJB (collectively, “Plaintiffs”), and Defendant, CoreCivic, Inc. (“Defendant”), stipulate to extend the deadline for Defendant to file its Replies in Support of

1 Motion for Summary Judgment and *Daubert* Motions from October 4, 2024 to October 25,
2 2024. (Dkts. 112; 113.) For the following reasons, the parties respectfully request that the
3 Court approve their Stipulation to extend these deadlines.

4 Good cause exists to extend these deadlines to October 25, 2024. While undersigned
5 counsel has been diligently reviewing Plaintiff's Response to Defendant's Motion for
6 Summary Judgment and Response to Defendant's *Daubert* Motion to Exclude Testimony of
7 Ryan D. Herrington, M.D., M.P.H. (see Dkts. 116; 117), undersigned counsel requires
8 additional time to do so prior to preparing CoreCivic's Replies. Defense counsel also requires
9 additional time, as both are preparing for out-of-state trials in other matters (one of which,
10 was recently added to counsel's calendar). *See, e.g., Taplin v. CoreCivic, et al.*, No. 101-CV-
11 2021-00896 (N.M.); *Rooks v. CoreCivic, et al.*, No. CJ-2022-03360 (Okla.). This extension
12 will not affect any other case management deadlines.

13 For the foregoing reasons, the parties respectfully request that the Court approve their
14 Stipulation and extend the deadline for Defendant to file its Replies in Support of Motion for
15 Summary Judgment and *Daubert* Motions from October 4, 2024 to October 25, 2024.

16 DATED this 26th day of September, 2024.
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19 **IT IS SO ORDERED:**

20 
21 UNITED STATES DISTRICT JUDGE

22 DATED: September 30, 2024
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1 STRUCK LOVE BOJANOWSKI & ACEDO, PLC
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3 By /s/ Kristina R. Rood
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13 *Attorneys for Defendant CoreCivic*

14 CLARK HILL, PLLC
15

16 By /s/ Paola M. Armeni
17

18 Paola M. Armeni
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21 Las Vegas, NV 89135
22 *Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 26, 2024, I electronically transmitted the attached
3 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice
4 of Electronic Filing to the following CM/ECF registrants:

5 Paola Armeni parmeni@clarkhill.com
6 Gia N. Marina gmarina@clarkhill.com

7 I hereby certify that on this same date, I served the attached document by U.S. Mail,
8 postage prepaid, on the following, who is not a registered participant of the CM/ECF System:

9 N/A

10 /s/ E. Glover

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